

6/10/2022

Re: Response of **WILONDA THORNTON** to Claim Objection

F I L E D  
UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS

JUN 16 2022

To: Cozen O'Connor  
123 NORTH WACKER DRIVE  
SUITE 1800  
CHICAGO, IL 60606  
Attn: Allen J. Guon, Esq

JEFFREY P. ALLSTEADT, CLERK  
**INTAKE 2**

The following is a response to the Tenth Omnibus Objection to Certain Duplicate Employee Claims.

As per the requirements, my objections are as follows:

- a) **Name of Court:** United Bankruptcy Court, Northern District of Illinois, Eastern Division  
**Debtor:** Pipeline- Westlake Hospital, LLC, et al  
**Case No.** 19-22878

**RESPONSE OF WILONDA THORNTON to CLAIM OBJECTION**

- b) Claimant **WILONDA THORNTON** responds to the objection on the basis of the facility (Westlake Hospital/ Pipeline) abruptly closing without paying out any required severance or my accrued benefits (PTO).
- c) The claim should not be disallowed or modified because the facility (Westlake Hospital/ Pipeline) closed abruptly without notice and did not provide the required 90-day severance that is owed, nor did they pay the accrued benefits owed to me at the time of the disillusionment of my employment.

The company locked the employees out of the application/system where we were able to view our payment stubs and total amount of accrued benefits. Due to the lockout, the company made it impossible to obtain exact numbers. I am able to provide an estimate of the amount owed based on a previous payment stub I was able to locate. I had well over 200 PTO hours when my employment was terminated in August 2019. Unfortunately, the last payment stub that I have, that lists 202 available PTO hours, is from November 2018.. After the initial announcement that Pipeline was going to close the hospital down, the work environment became hostile in my opinion. Many of us went to work nervous and anxious, not knowing if we would still have a job. Employees were told that we couldn't call off or we would be let go. With that, as well as witnessing fellow employees, including managers, being let go for reasons unknown, I did not call off at all from that moment forward. My PTO hours kept accruing. If I was cancelled for any shifts due to low census, I was able to use PTO hours. However, I was not cancelled very often, as I was regularly floated to the Emergency Department because they were

short staffed. I was cancelled for all 3 shifts the week the hospital officially closed. I was not allowed to use any PTO for those cancelled shifts. Again, I am unable to provide documentation listing exact numbers due to the reasons previously stated above. My PTO hours did exist. It's unfortunate that Pipeline was able to prevent us from obtaining any of our benefit information. I worked hard and accrued those PTO hours. I am filing this claim because this money is owed to me. I should not have to suffer and lose money due to the poor and selfish choices Pipeline made.

- d) Documents were provided to the responsible parties as requested in January 2020 and are attached to that file as proof of claim.

Also, I have included a copy of the above-mentioned payment stub that lists my 202 available PTO hours.

- e) Trustee may return any reply to me at: **WILONDA THORNTON** 6720 Echo Ln. Apt 5.; Westmont, IL; 60559.
- f) Claimant possessing ultimate authority to reconcile, settle or otherwise resolve claim: **WILONDA THORNTON** 6720 Echo Ln. Apt 5.; Westmont, IL; 60559. (708) 845-0201.

Regards,

Wilonda Thornton, BSN, RN

WILONDA L THORNTON's eStubViewTM

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VHS WESTLAKE HOSPITAL INC  
3249 S OAK PARK AVE  
BERWYN, IL 60402

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Employee Number		602252	Cost Center	Check Number
Employee Name	WILONDA L THORNTON	6030		
WILONDA L THORNTON	6720 ECHO LANE	Period Ending	Check Date	
6720 ECHO LANE	APT 5	11/17/2018	11/23/2018	
APT 5	WESTMONT IL 60559	Rate	Exemptions	
WESTMONT IL 60559		30.81	00	
		Gross Pay	Net Pay	
		2689.23	1729.66	

Withholding Taxes		
Description	This Period	Year To Date
Federal	346.90	9566.45
State	120.24	3127.38
Local		
FICA-M	37.56	976.62
FICA	160.60	4175.90
Totals	665.30	17846.35

Available Hours	
Benefit	Hours Available
PTO	202.00
SIC	
VAC	
EIB	219.54

Earnings			
Description	Hours	Current	YTD
REGULAR	.40.00	1232.40	50938.21
OT 1.5	4.25	203.34	4582.72
PTOS	36.00	1109.16	2579.64
SHFT DF2	12.00	40.20	1891.07
SHFT DF3	24.50	104.13	5184.03
HOL PREM			2640.19
WKD DIFF			896.14
EIB			731.04
INCENTIV			160.00
EDU			123.24
Totals	116.75	2689.23	69726.28

Deductions		
Description	Current	YTD
DEN PRE	8.54	204.96
LTD POST	4.32	102.87
MED PRE	86.82	2083.68
STD POST	6.88	163.68
VIS PRE	3.52	84.48
LTC	10.85	260.40
AD&D EE	.71	17.04
ESUPPLFE	1.04	24.96
401K	161.35	4173.95
PACCDNT	2.97	71.28
VOLUNTRY	7.27	174.48
Totals	294.27	7361.78